

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust  
Litigation, MDL 2817*

*This document relates to:  
Authenticom, Inc. v. CDK Global, LLC et al.,  
Case No. 1:18-cv-00868 (N.D. Ill.)*

No. 1:18-CV-864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

**DECLARATION OF BRICE WILKINSON**

My name is Brice Wilkinson. I am an attorney and counsel of record for The Reynolds and Reynolds Company (“Reynolds”) in the above-captioned MDL. I am over 18 years of age, of sound mind, and capable of making this declaration. I am familiar with the pleadings and discovery in this case. I declare under penalty of perjury that the facts stated in this declaration are within my personal knowledge and are true and correct.

1. Included as Exhibits to Reynolds’s Motion for Partial Summary Judgment are the following documents produced or generated as part of discovery in the above-captioned MDL. Certain of these documents contain highlighting for the Court and parties’ convenience.

- Exhibit 1 is a true and correct copy of excerpts from the deposition transcript in this litigation of Robert Burnett.
- Exhibit 2 is a true and correct copy of excerpts from the deposition transcript in this litigation of Christopher Kirby.
- Exhibit 3 is a true and correct copy of excerpts from the deposition transcript in this litigation of Robert Brockman.
- Exhibit 9 is a true and correct copy of Reynolds Copyright registration TX 7-586-896.
- Exhibit 10 is a true and correct copy of Reynolds Copyright registration TX 7-586-863.
- Exhibit 11 is a true and correct copy of Reynolds Copyright registration TX 8-538-825.
- Exhibit 12 is a true and correct copy of Reynolds Copyright registration TX 8-538-541.

- Exhibit 16 is a true and correct copy of excerpts from the deposition transcript in this litigation of Ronald Lamb.
- Exhibit 17 is a true and correct copy of Plaintiffs' deposition exhibit 638 in this litigation, a February 19, 2007 Automotive News Article.
- Exhibit 19 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00170940.
- Exhibit 22 is a true and correct copy of excerpts from the deposition transcript in this litigation of Keith Hill.
- Exhibit 23 is a true and correct copy of excerpts from the deposition transcript in this litigation of Reynolds 30(b)(6) witness Kelly Hall.
- Exhibit 24 is a true and correct copy of excerpts from the deposition transcript in this litigation of Katie Wiersgalla.
- Exhibit 25 is a true and correct copy of excerpts from the deposition transcript in this litigation of Superior Integrated Solutions, Inc.'s 30(b)(6) witness Phillip Battista.
- Exhibit 26 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00468320 and associated metadata.
- Exhibit 28 is a true and correct copy of excerpts from the deposition transcript in this litigation of Brian Clements.
- Exhibit 29 is a true and correct copy of excerpts from the 2019 deposition transcript in this litigation of Steve Cottrell.
- Exhibit 32 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00219452.
- Exhibit 33 is a true and correct copy of an Authenticom email chain and attachment as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00141204.
- Exhibit 34 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00093108.
- Exhibit 35 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00141219.
- Exhibit 36 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00167914.

- Exhibit 37 is a true and correct copy of excerpts from the deposition transcript in this litigation of Christopher Hellyer.
- Exhibit 38 is a true and correct copy of excerpts from the deposition transcript in this litigation of Jon Martin.
- Exhibit 39 is a true and correct copy of excerpts from the deposition transcript in this litigation of William Munns.
- Exhibit 40 is a true and correct copy of excerpts from the deposition transcript in this litigation of Authenticom 30(b)(6) witness Dane Brown.
- Exhibit 41 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00431252.
- Exhibit 42 is a true and correct copy of an Authenticom email chain and attachment as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00431361.
- Exhibit 43 is a true and correct copy of an Authenticom spreadsheet as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00170533.
- Exhibit 44 is a true and correct copy of excerpts from the deposition transcript in this litigation of Lucas Hembd.
- Exhibit 45 is a true and correct copy of excerpts from the deposition transcript in this litigation of Travis Robinson.
- Exhibit 46 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00096097.
- Exhibit 47 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00091915.
- Exhibit 48 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00095693.
- Exhibit 49 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00083390.
- Exhibit 50 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00280874.
- Exhibit 51 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00280909.

- Exhibit 52 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00280913.
- Exhibit 53 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00280915.
- Exhibit 54 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00280937.
- Exhibit 55 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00281398.
- Exhibit 56 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00281333.
- Exhibit 57 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00281303.
- Exhibit 58 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00281301.
- Exhibit 59 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00281253.
- Exhibit 60 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00315748.
- Exhibit 61 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00281205.
- Exhibit 62 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00281015.
- Exhibit 63 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00280991.
- Exhibit 64 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00280958.
- Exhibit 65 is a true and correct copy of excerpts from the deposition transcript in this litigation of Joe Noth.
- Exhibit 66 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00092449.
- Exhibit 67 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00092142.

- Exhibit 68 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00171450.
- Exhibit 69 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00168020.
- Exhibit 70 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00168116.
- Exhibit 71 is a true and correct copy of an Authenticom document as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00465304 and associated metadata.
- Exhibit 72 is a true and correct copy of an Authenticom document as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00230422 and associated metadata.
- Exhibit 73 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00242735.
- Exhibit 74 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00168432.
- Exhibit 75 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00101801.
- Exhibit 76 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00154490.
- Exhibit 77 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00221025.
- Exhibit 78 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00091792.
- Exhibit 79 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00170407.
- Exhibit 80 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00094637.
- Exhibit 81 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00174085.
- Exhibit 82 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00281367.

- Exhibit 83 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00472681.
- Exhibit 84 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00170766.
- Exhibit 85 is a true and correct copy of excerpts from the deposition transcript in this litigation of Russell Gentry.
- Exhibit 86 is a true and correct copy of an Authenticom email chain and attachment as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00091619.
- Exhibit 87 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00175368.
- Exhibit 88 is a true and correct copy of an Authenticom document as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00472396.
- Exhibit 89 is a true and correct copy of an Authenticom email chain and attachments as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00155147.
- Exhibit 90 is a true and correct copy of an email chain and attachments as produced by party Authenticom in this litigation by Authenticom with the beginning Bates number of AUTH\_00468019.
- Exhibit 93 is a true and correct copy of an Authenticom email chain originally as produced by party Authenticom in this litigation by Authenticom as exhibit 32 [Auth. Dkt. 65-7] in support of Authenticom's motion for preliminary injunction, and subsequently Bates labeled REYMDL00015727.
- Exhibit 95 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00067483.
- Exhibit 96 is a true and correct copy of an Authenticom email chain as produced by party Authenticom in this litigation with the beginning Bates number of AUTH\_00150633.
- Exhibit 97 is a true and correct copy of an April 2007 Automotive News Article originally produced as Defendants' Exhibit 72 [Auth. Dkt. 104-28] in opposition to Authenticom's motion for preliminary injunction and subsequently produced with the Bates label of REYMDL00015601.
- Exhibit 98 is a true and correct copy of a January 2012 Automotive News Article produced with the Bates label of REYMDL01075600.

- Exhibit 99 is a true and correct copy of an Authenticom email chain and attachments produced with the beginning Bates number of AUTH\_00280842.
- Exhibit 100 is a true and correct copy of an Authenticom email chain produced with the beginning Bates number of AUTH\_00094640.
- Exhibit 101 is a true and correct copy of Authenticom, Inc.'s Objections and Responses to Defendant The Reynolds and Reynolds Company's Requests for Admission in this litigation.
- Exhibit 102 is a true and correct copy of Authenticom, Inc.'s Objections and Responses to Defendant The Reynolds and Reynolds Company's First Set of Interrogatories in this litigation.
- Exhibit 103 is a true and correct copy of an Authenticom email chain produced with the beginning Bates number of AUTH\_00170330.
- Exhibit 104 is a true and correct copy of an Authenticom email chain produced with the beginning Bates number of AUTH\_00169111.
- Exhibit 105 is a true and correct copy of an Authenticom email chain produced with the beginning Bates number of AUTH\_00195650.
- Exhibit 106 is a true and correct copy of an Authenticom email chain produced with the beginning Bates number of AUTH\_00230497.
- Exhibit 107 is a true and correct copy of a February 4, 2007 Automotive News Article originally produced as exhibit 20 [Auth. Dkt. 64-20] in support of Authenticom's motion for preliminary injunction by Authenticom and subsequently Bates labeled REYMDL00012341.
- Exhibit 108 is a true and correct copy of a Reynolds Fuel article that was produced in this litigation by Authenticom as exhibit 14 in support of Authenticom's motion for preliminary injunction [Auth. Dkt. 64-14].

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of October, 2019.

A handwritten signature in black ink, appearing to read 'Brice Wilkinson', written over a horizontal line.

Brice Wilkinson